



May 8, 2020

Reference No. 038443-111

Mr. Robert Thompson  
Remedial Project Manager  
United States Environmental Protection Agency  
Region V  
77 West Jackson Boulevard  
Mail Code SR-6J  
Chicago, Illinois  
60604

Ms. Tamara McPeck  
Environmental Response and Revitalization  
Ohio Environmental Protection Agency  
Southwest District Office  
401 East Fifth Street  
Dayton, Ohio  
45402

Mr. Steve Renninger  
On-Scene Coordinator  
USEPA Region V  
Emergency Response Branch  
26 West Martin Luther King Drive  
Cincinnati, Ohio  
45268

Dear Mr. Thompson, Ms. McPeck, and Mr. Renninger:

**Re: Progress Report: April 1 through 30, 2020  
South Dayton Dump and Landfill Site, Moraine, Ohio (Site)**

This Monthly Progress Report is submitted in accordance with the Administrative Settlement and Order on Consent (ASAOC) for Remedial Investigation/Feasibility Study (RI/FS) Proceeding Under Sections 104, 107, and 122 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. §§ 9604, 9607, and 9622 (United States Environmental Protection Agency [USEPA]) Docket No. V-W-16-C-011) effective June 11, 2016 (RI/FS ASAOC), and the ASAOC for Removal Action Proceeding Under Sections 104, 106(a), 107, and 122 of the CERCLA, 42 U.S.C. §§ 9604, 9606(a), 9607, and 9622 USEPA Docket No. V-W-13-C-010, effective April 8, 2013 (Removal Action ASAOC), for the period of April 1 through 30, 2020.

The next Progress Report for the month of May 2020 will be submitted on or before June 10, 2020.



## **Significant Developments in this Reporting Period**

### ***RI/FS ASAOC Developments***

Activities conducted in April 2020 are summarized below.

- Conference calls were conducted on April 17 and 24, 2020 to discuss project status. The participants included USEPA (Robert Thompson), Jacobs (Brett Fishwild, Brooke Harris), and GHD (Julian Hayward). This included discussion regarding the schedule for upcoming field work (monitoring well and soil gas probe installation). GHD stated that preparations are being made for monitoring well installation, which is tentatively scheduled to commence on May 11, 2020.
- GHD received a letter from USEPA dated April 4, 2020 regarding the Site Characterization Technical Memorandum for the Soil/Fill and Soil Gas Investigation (SCTM Report) dated July 17, 2019. The USEPA letter provides a review of GHD's January 24, 2020 response to comments (RTCs), which was provided in reply to USEPA's September 12, 2019 comments on the SCTM Report.

### ***Removal Action ASAOC Developments***

On April 7, 2020, GHD discussed the results of the annual proficiency sampling completed at Building 24 (Globe Manufacturing) in February 2020.<sup>1</sup> with Globe representatives. GHD explained that Tetrachloroethylene (PCE) was detected in two indoor air samples, and that additional sampling is required. Globe noted that no visitor access was allowed at that time due to COVID-19 restrictions. GHD asked Globe to ensure that the building ventilation system was functioning properly to exchange fresh air, which was confirmed by Globe. GHD was subsequently notified by Globe that entry for GHD personnel to conduct sampling would be allowed in May 2020. The above was also reviewed with USEPA during the conference calls on April 17 and April 24. The proposed additional sampling by GHD at Building 24 is discussed further below.

GHD received a letter from USEPA dated April 8, 2020 regarding the Sub-Slab (SS) and Indoor Air (IA) Sample Results dated October 22, 2019. The USEPA letter provides a review of GHD's February 26, 2020 RTCs, which was provided in reply to USEPA's December 18, 2019 comments on the SS and IA Sample Results.

### ***Proposed Additional Indoor Air Sampling at Building 24***

As reported previously, PCE concentrations at two IA sample locations at Building 24 (IA-24-B and IA-24-D) were marginally greater than the Ohio Department of Health (ODH) screening level of 33 parts per billion by volume (ppbv) in February 2020 samples. Historically, PCE concentrations at Building 24

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<sup>1</sup> The February 2020 annual proficiency sampling results for Building 17 and Building 24 are included in the March 2020 Monthly Progress Report.



exceeded the ODH IA screening level once in December 2014 (41 ppbv at sample location IA-24-B), but otherwise IA concentrations have been less than 0.50 ppbv.

GHD proposes to complete the following next steps at Building 24 in response to the exceedances of ODH IA screening level for PCE detected during the February 2020 sampling event:

- Inspect the sub-slab depressurization system (SSDS) to confirm the system is operating within acceptable parameters, including SS vacuum measurements.
- Update the building survey to determine if there are any new or different conditions that may have contributed to the elevated indoor air PCE concentrations.
- Collect IA and SS samples for TO-15 laboratory analysis, including two IA samples (IA-24-B and IA-24-D), two co-located SS samples (SS-24-B and SS-24-D), and one outdoor ambient air sample.

GHD proposes to complete the above activities in May 2020 subject to access approval by Globe manufacturing.

## **Summaries of all Anticipated Problems and Planned Resolutions**

No difficulties/delays were encountered during this reporting period. However, the COVID-19 pandemic and requirements for physical/social distancing, isolation, and quarantine could cause future temporary or long-term equipment, supply and/or personnel availability issues that could affect the project schedule. Federal, state and local orders, as well as guidance from the Center for Disease Control, will be reviewed and followed before any field work or in-person meetings are conducted. We will keep USEPA informed of any potential issues as the COVID-19 pandemic continues to develop and change.

## **Projected Work for the Next Reporting Period**

- GHD will continue planning and scheduling RI/FS activities in accordance with the approved work plan. The planned activities include:
  - Coordination of 2020 soil gas field investigation activities.
  - Commence 2020 groundwater field investigation activities, including public and private utility locates and drilling subcontractor mobilization to the Site, on May 11, 2020.
  - Review and assess November 2019 floodplain soil analytical results, and prepare technical memorandum.
  - Review USEPA comments dated March 31 (related to the groundwater investigation), and April 4 (related to soil/fill and soil gas investigation).
  - Continue initial risk assessment activities including submittal of Risk Assessment Assumptions Document (RAAD).



- The Respondents and USEPA On-Scene Coordinator will continue to work together to implement the VI mitigation work plan. The planned activities include:
  - Collect and submit Building 24 IA and SS samples for TO-15 laboratory analysis, as described above.
  - Replace the protective casings on vacuum blowers at EP-2 and EP-3 at Building 24.
  - Repair the exterior vent pipe at Building 9 (B&G Equipment and Truck Repair) when weather conditions are suitable and subject to access restrictions.
  - Review USEPA comments dated April 8 (related to indoor air and sub-slab soil gas results).

Should you have any questions on the above, please do not hesitate to contact us.

Sincerely,

GHD

A handwritten signature in blue ink that reads "Julian Hayward". The signature is written in a cursive, flowing style.

Julian Hayward

JH/kf/4

cc: (all by pdf) Scott Glum, Ohio EPA

Ken Brown, ITW  
Bryan Heath, NCR  
Wendell Barner, Barner Consulting  
Jim Campbell, EMI  
Andrew Dorn, ITW  
Scott Blackhurst, Kelsey Hayes Company  
Michael Hughes, Neal, Gerber & Eisenberg  
Wray Blattner, Thompson Hine  
Larry Silver, Langsam Stevens Silver & Hollaender  
Tim Hoffman, Dinsmore & Shohl  
Brooke Harris, Jacobs  
Valerie Chan, GHD